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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

To: The Commission

COMMENTS

The Eastern Washington and Northern Idaho DTV Channel Allocation Caucus (the "Caucus")¹, by its attorneys and pursuant to the Commission's Public Notice released on December 2, 1997, hereby respectfully submits its Comments in response to the ex parte submission of the Association for Maximum Service Television, Inc. and Other Broadcasters (collectively referred to as "MSTV") filed on November 20, 1997. See Public Notice, "FCC Seeks Comment on Filings Addressing Digital TV Allotments," MM Docket No. 87-268; "Ex Parte Submission Based On New Technical Discoveries To Help the Commission Improve The DTV Table of Allotments/Assignments Submitted by the Association for Maximum Service Television, Inc.

¹ The Caucus includes the following television stations: KAPP, Yakima, WA, and KVEW, Kennewick, WA, authorized to Apple Valley Broadcasting, Inc.; KAUP (CP), Pendleton, OR, authorized to Communication Properties, Inc.; KUID, Moscow, ID, and KCDT, Coeur d'Alene, ID, authorized to the Idaho State Board of Education; KYVE, Yakima, WA, authorized to KCTS Television; KHQ-TV, Spokane, WA, authorized to KHQ, Incorporated; KREM-TV, Spokane, WA, authorized to King Broadcasting Company; KSKN, Spokane, WA, authorized to KSKN, Inc.; KAYU, Spokane, WA, authorized to Mountain Licenses, L.P.; KLEW, Lewiston, ID, KEPR, Pasco, WA, and KIMA, Yakima, WA, authorized to Retlaw Enterprises, Inc.; KSPS, Spokane, WA, authorized to Spokane School District No. 81; KXLY, Spokane, WA, authorized to Spokane Television, Inc.; and KTNW, Richland, WA, and KWSU, Pullman, WA, authorized to Washington State University.

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and Other Broadcasters, " MM Docket No. 87-268, November 20, 1997 ("MSTV Submission").

These Comments are submitted in order to: (1) provide general support for MSTV's suggestion that the Commission adjust the DTV Table of Allotments to minimize loss of coverage by short-spaced adjacent DTV-DTV stations; and (2) reaffirm the Caucus' channel plan in light of recent developments.

By way of background, on June 13, 1997, the Caucus filed a Petition for Reconsideration of the Commission's Sixth Report and Order ("Sixth R & O"), FCC 97-115, released April 21, 1997, 62 Fed. Reg. 26684 (May 14, 1997) (the "Petition") proposing a negotiated alternative DTV channel plan.² This plan, which encompasses all affected licensees in the eastern Washington - northeast Oregon - northern Idaho geographic region, corrects a number of short-spaced adjacent channel DTV allotments, accounts for mountainous terrain, thick forest and sparse population in the region, reduces the number of first adjacent DTV-NTSC stations, and proposes only channels within the so-called "hard" core of spectrum. The Caucus' plan received industry support in the MSTV Submission, which appended the Petition and urged the Commission to "take into account the concerns and suggestions of individual stations and groups such as the Eastern Washington and Northern Idaho DTV Allocation Caucus". MSTV Submission at 4 & Appendix 3.

²On August 22, 1997, pursuant to the Commission's Order in MM Docket 87-268, DA 97-1377, released July 2, 1997, 62 Fed. Reg. 37145 (July 11, 1997), the Caucus supplemented the Petition with certain clarifications and an Engineering Statement reaffirming the Caucus' alternative channel plan in light of OET Bulletin No. 69.

The Caucus applauds MSTV and other broadcasters involved in efforts to advise and assist the Commission in developing a practicable DTV Table of Allotments as promptly as possible. MSTV's leadership has been and continues to be invaluable in resolving issues which could impede the transition to digital.

The Caucus agrees with MSTV that the DTV Table of Allotments contained in the Sixth R & O may not fully account for the substantial potential for interference between short-spaced adjacent channel DTV-DTV stations. Indeed, one of the primary considerations in developing the Caucus' alternative channel plan was elimination of interference created by short-spaced adjacent channel DTV allocations. Recent test results indicating that loss of coverage by short-spaced first adjacent DTV stations had been underestimated by the Commission and the industry confirm the necessity that the Commission adopt the alternative channel plan submitted by the Caucus.

The computer-generated Improvements to the DTV Table contained in Exhibit 1A of the MSTV Submission fail to incorporate the negotiated channel changes proposed by the Caucus. Accordingly, if the Commission chooses to reevaluate certain DTV channel allocations in light of the MSTV Submission, the Caucus respectfully notes that the alternative allotments for the Eastern Washington and Northern Idaho region set forth in Appendix 3 of the MSTV Submission appropriately account for the DTV-DTV short-spacing

problem and urges that the specific channel changes for the region contained in Exhibit 1A of the MSTV Submission not be adopted.³

WHEREFORE, the Caucus supports MSTV's conclusion that the DTV Table of Allotments may not fully account for potentially severe interference between short-spaced adjacent DTV-DTV stations and respectfully urges that its negotiated channel plan be adopted as a solution to this problem for the Eastern Washington and Northern Idaho region.

Respectfully submitted,

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³As stated in the text of the MSTV Submission, the proposed channel changes provided in Exhibit 1A "are not intended to foreclose favorable consideration of present and future requests for individual changes to the DTV Table." See MSTV Submission at 4. Thus, there is no inconsistency between the Caucus' general support for MSTV's filing and its request that the Commission not adopt MSTV's suggested improvements for the Eastern Washington and Northern Idaho region.

CERTIFICATE OF SERVICE

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